

PARKER IBRAHIM & BERG LLP

March 4, 2020

VIA ECF

Hon. Carla E. Craig, U.S.B.J.
U.S. Bankruptcy Court
Eastern District of New York
Conrad B. Duberstein Courthouse
271-C Cadman Plaza East - Suite 1595
Brooklyn, New York 11201-1800

Re: Gustavia Home, LLC v. Deutsche Bank National Trust Company, et al
Adversary Pro. No.: 19-01097-cec

Dear Judge Craig:

This firm represents Deutsche Bank National Trust Company, as Trustee, on behalf of the holders of the Impac Secured Assets Corp., Mortgage Pass-Through Certificates, Series 2006-3 sued incorrectly herein as Deutsche Bank National Trust Company As Trustee Under The Pooling and Servicing Agreement Related to Impac Secured Assets Corp., Mortgage Pass-Through Certificates Series 2006-3 ("Defendant") in the above referenced matter.

On March 3, 2020, Defendant wrote to request leave to file a Motion for Summary Judgment under seal and entry of an Order regarding disclosure of certain protected information and documents. Plaintiff Gustavia Home, LLC ("Plaintiff") subsequently objected to this request, noting an outstanding deposition notice.

Subsequent to the respective letters, counsel for the parties conferred on the matters raised. It is Defendant's understanding that Plaintiff does not object to the proposed Protective Order regarding the disclosure of confidential information and the filing of documents under seal. Should the Court agree, a proposed order will be submitted for review and execution on presentment.

Defendant has agreed to produce its witness for deposition on March 13, 2020. The parties believe that this will resolve the currently outstanding discovery. Based upon the anticipated conclusion of discovery on March 13, 2020, Defendant respectfully submits the following proposed dispositive motion schedule for this Court's consideration and approval:

- Dispositive motions will be filed by March 20, 2020.
- Opposition papers will be filed by March 30, 2020.
- Reply papers will be filed by April 2, 2020.
- Motions will be returnable on April 3, 2020, or a date thereafter as this Court is available.

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Accordingly, Defendant respectfully requests that Your Honor grant permission to file dispositive motions under seal, as outlined above, and enter an Order regarding the disclosure and protection of confidential information. If you have any questions in this regard, please do not hesitate to have Your Chambers contact me. Thank you.

Respectfully submitted,

/s/ Karena J. Straub

Karena J. Straub

cc: Seth D. Weinberg, Esq. (via ECF)